Case 19-10683-JNP Doc 74-1 Filed 06/14/22 Entered 06/14/22 16:59:23 Desc Statement as to Why No Brief is Necessary Page 1 of 1

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IN THE MATTER OF:

Jason M. Martinez Megan E. Martinez

DEBTOR(S),

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

> CHAPTER 13 CASE NO. 19-10683 JNP

STATEMENT AS TO WHY NO BRIEF IS NECESSARY IN ACCORDANCE WITH "LOCAL RULES OF BANKRUPTCY PRACTICE" RULE 3(C)

The within Notice of Motion requests relief from the automatic stay on the grounds, as set forth on the accompanying Certification, that the debtor(s) have failed to maintain their monthly mortgage payments to the Secured Creditor.

As the facts the secured creditor relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

DATED: June 14, 2022 /s/ Denise Carlon, Esquire

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